

FRANKLIN BROCKWAY GOWDY, SBN 47918
THOMAS D. KOHLER, SBN 207917
MORGAN, LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 94105-1126
Tel: 415.442.1000
Fax: 415.442.1001

DAVID C. BOHRER, SBN 212397
MICHAEL J. LYONS, SBN 202284
DION M. BREGMAN, SBN 208393
MORGAN, LEWIS & BOCKIUS LLP
2 Palo Alto Square
3000 El Camino Real, Suite 700
Palo Alto, CA 94306-2122
Tel: 650.843.4000
Fax: 650.843.4001
Attorneys for Plaintiff NIDEC CORPORATION and and
Counter-defendants NIDEC CORPORATION, NIDEC
AMERICA CORPORATION AND NIDEC SINGAPORE PTE,
LTD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

NIDEC CORPORATION,
Plaintiff,

vs.

VICTOR COMPANY OF JAPAN, LTD.,
JVC COMPONENTS (THAILAND) CO.,
LTD., AGILIS, INC. and AGILIS
TECHNOLOGY INC.,

Defendants.

NIDEC AMERICA CORPORATION,
and NIDEC SINGAPORE PTE, LTD.

Additional
Defendants on the
Counterclaims.

Case No. C05 00686 SBA

**DECLARATION OF DION M. BREGMAN
IN SUPPORT OF NIDEC'S OPPOSITION
TO JVC'S MOTION FOR SUMMARY
JUDGMENT OF INVALIDITY**

Date: February 27, 2007

Time: 1:00 p.m.

Dept.: Courtroom 3

Judge: Honorable Sandra B. Armstrong

1 I, Dion M. Bregman, declare as follows:

2 1. I am a Partner at the law firm of Morgan, Lewis & Bockius LLP, 2 Palo Alto
3 Square, 3000 El Camino Real, Suite 700, Palo Alto, California 94306, and a member in good
4 standing of the Bar of the State of California. I am admitted to practice in the United States
5 District Court for the Northern District of California. Morgan, Lewis & Bockius LLP has been
6 retained as trial counsel for Nidec Corporation, Nidec America Corporation and Nidec Singapore
7 PTE, Ltd (“Nidec”) in the present action. I submit this declaration in support of Nidec’s
8 Opposition to JVC’s Motion for Summary Judgement of Invalidity. I have personal knowledge of
9 each statement set forth herein, and each such statement is true and correct.

10 2. Attached hereto as **Exhibit 1** is a true and correct copy of U.S. Patent No.
11 6,343,877.

12 3. Attached hereto as **Exhibit 2** is a true and correct copy of U.S. Patent No.
13 5,763,967.

14 4. Attached hereto as **Exhibit 3** is a true and correct copy of U.S. Patent No.
15 6,793,394.

16 5. Attached hereto as **Exhibit 4** is a true and correct copy of relevant pages of the
17 September 21, 2006 deposition transcript of Forrest Titcomb.

18 6. Attached hereto as **Exhibit 5** is a true and correct copy of Exhibit 20 to the
19 September 20, 2006 deposition of Forrest Titcomb.

20 7. Attached hereto as **Exhibit 6** is a true and correct copy of relevant pages of the
21 January 31, 2007 deposition transcript of Akira Nishio.

22 8. Attached hereto as **Exhibit 7** is a true and correct copy of U.S. Patent No.
23 6,072,660.

24 9. Attached hereto as **Exhibit 8** is a true and correct copy of U.S. Patent No.
25 5,880,545.

26 10. Attached hereto as **Exhibit 9** is a true and correct copy of U.S. Patent No.
27 5,844,748.

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1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct.

3 Executed on this the ____th day of February 2007 in Palo Alto, California.

4
5 /s/ Dion M. Bregman

6 Dion M. Bregman
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